

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO. 1:23-cv-23791

CHRISTON KNOWLES,
an Individual,

Plaintiff,

v.

PRESTIGE AUTO MIAMI LLC,
a Florida limited liability company, and
CIG FINANCIAL
a California limited liability company,

Defendants.

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS.

COMES NOW, undersigned counsel, Carlos F. Rodriguez (“Mr. Rodriguez”) pursuant to Rule 11. 1 (D)(3) of the Local Rules of the United States District Court for the Southern District of Florida, files this Motion to Withdraw as Counsel ("Motion") in the above-referenced matter. In support of said Motion, Carlos F. Rodriguez states the following:

1. Irreconcilable differences have developed between Defendants, PRESTIGE AUTO MIAMI LLC, and CIG FINANCIAL (the “Defendants”), and Mr. Rodriguez.
2. In order to avoid any possible or potential conflicts, Mr. Rodriguez request leave to withdraw as counsel for Defendants.
3. More specifically, undersigned counsel has made multiple attempts (at least ten), via email, telephone conference, and text messages, to communicate with the representative for Defendant PRESTIGE AUTO MIAMI LLC, who has failed to respond to all attempts to communicate, and thus has compromised undersigned counsel’s ability to effectively represent both of the Defendants.

4. The granting of this Motion will not delay this matter and not otherwise be inequitable.
5. Defendants will not be unfairly prejudiced by the withdrawal of Mr. Rodriguez.

WHEREFORE, Attorney Carlos F. Rodriguez, Esq., and the law firm of ERRALAW respectfully requests that they be permitted to withdraw as attorneys of record for Defendants, PRESTIGE AUTO MIAMI LLC, and CIG FINANCIAL, and any other relief to which they may be entitled.

CERTIFICATE OF GOOD FAITH CONFERENCE;
CONFERRED AND MOTION IS UNOPPOSED

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that on February 27th, 2024, counsel for the movant conferred with counsel for the Plaintiffs and in a good faith informed Plaintiff's counsel of undersigned counsel's intent to withdraw from this case. Plaintiff counsel acknowledged he does not oppose undersigned counsel's withdrawal.

Respectfully submitted,

/s/ Carlos F. Rodriguez
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic filing with the Clerk of the court via CM/ECF, which will send notice of electronic filing to all counsel of record, and by regular mail to the parties listed in the Service List for manual service on this 13th day of March, 2024.

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BY: /s/ Carlos F. Rodriguez
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